

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

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In the Matter of )  
 )  
Advanced Television Systems )  
and Their Impact upon the )  
Existing Television Broadcast )  
Service )

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY  
MM Docket No. 87-268

**REPLY COMMENTS OF U S WEST, INC.**

In these Reply Comments, U S WEST, Inc. ("U S WEST") supports the Comments filed by the National Cable Television Association, Inc. (or "NCTA")<sup>1</sup> in the Sixth Further Notice of Proposed Rule Making on Advanced Television Systems.<sup>2</sup>

In its Comments, the NCTA addresses several key issues in the allocation of additional spectrum to broadcasters for the provision of digital television (or "DTV"). U S WEST supports the NCTA's positions on the following issues and requests that the Federal Communications Commission ("Commission") take action in this docket consistent therewith. First, broadcasters should only receive the free spectrum necessary to provide one digital channel. Additionally, free spectrum provided for DTV should only be used for the provision of a single over-the-air

<sup>1</sup> Comments of the National Cable Television Association, Inc. filed herein Nov. 22, 1996.

<sup>2</sup> In the Matter of Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service, Sixth Further Notice Of Proposed Rule Making, 11 FCC Rcd. 10968 (1996) ("Sixth FNPRM").

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broadcast channel and not for a host of other unrelated services. Second, broadcasters should be required to return their current analog channel spectrum after a brief transition period as specified by the Commission. Lastly, additional must-carry obligations should not be imposed upon cable or open video system (or "OVS") operators as a result of a broadcaster's transition to the provision of DTV.

It is important that the Commission consider the impact of its decisions in this proceeding on competition and other providers of video programming. In the video programming industry, only broadcasters have been provided with free spectrum for the delivery of their programming to the public. Other providers, including cable, OVS, Multichannel Multipoint Distribution ("MMDS"), Direct Broadcast Satellite ("DBS") and Local Multipoint Distribution Service ("LMDS"), have been, or will be, required to construct wireline networks or purchase spectrum at market prices. The public interest, along with fairness and equity, compel the Commission to consider the issues raised by these Reply Comments in any decision on the allocation of publicly-owned spectrum.

**I. BROADCASTERS SHOULD ONLY RECEIVE THE AMOUNT OF PUBLIC SPECTRUM NECESSARY TO BROADCAST ONE DTV CHANNEL AND SHOULD NOT BE ALLOWED TO USE SUCH SPECTRUM FOR OTHER UNRELATED SERVICES**

U S WEST supports the Commission in its goal to ensure the continuity and advancement of broadcast television in the United States. As competition and market forces move the rest of the video programming industry into the digital world, it is certainly in the public interest for broadcast television to make the transition at the same time. In this light, U S WEST agrees with the NCTA in its support for the

allocation of free public spectrum to broadcasters who wish to make the transition from analog to digital television. However, U S WEST limits its support to the provision of sufficient spectrum for broadcasters to provide one DTV channel. Of course, the amount of spectrum necessary to provide DTV will vary based on a broadcaster's decision to implement high definition television ("HDTV") or standard definition television ("SDTV").<sup>3</sup> In either case, broadcasters should not receive free spectrum above that which is needed for one channel. Additionally, broadcasters who request and are allotted spectrum to provide HDTV should be required to provide HDTV for a significant majority of the broadcast day.

By providing free public spectrum to broadcasters for their transition to digital transmission, the Commission ensures the continued viability of "free" television to the public. U S WEST believes that this is an important and worthy goal. However, broadcasters should not receive a spectrum allocation above that which is required for one DTV channel or be allowed to utilize free public spectrum for other purposes. This is consistent with the Commission's articulated position that market forces should be relied upon for the efficient and effective use of spectrum and the fostering of the competitive provision of new services.<sup>4</sup> Any other position or allocation of additional spectrum would distort the marketplace and provide unfair competitive advantages to broadcasters. The bottom line is that free public spec-

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<sup>3</sup> The Commission will need to review the technical requirements for both HDTV and SDTV digital television transmission and make a determination as to the amount of spectrum required to provide one channel of broadcast service.

<sup>4</sup> Sixth FNPRM, 11 FCC Rcd. at 10970 ¶ 3.

trum should not be used by broadcasters to provide pay television subscription or other competitive services.

The Commission is the public trustee of broadcast spectrum. As evidenced by the recent auctions of spectrum for a variety of purposes, there can be little doubt that spectrum is a valuable public resource. There are currently many commercial uses for spectrum, and certainly many more to be developed. In this proceeding, the Commission has consistently recognized its role in efficiently allocating and preserving this public resource.<sup>5</sup> Allowing broadcasters to utilize this free public spectrum for services beyond the transmission of a single channel of DTV would distort the competitive marketplace for wireless services and would not be in the best interest of the public. Should broadcasters wish to provide a wide range of competitive, for-profit wireless services, e.g., Internet access, information services, interactive television, paging, etc., they should be required to purchase spectrum for those purposes, the same as any other competitive enterprise. To allow otherwise would put other providers who were required to purchase spectrum at a competitive disadvantage and decrease the overall value of the public's spectrum resources. Such a result is not in the public interest, nor is it consistent with the Commission's publicly-stated goals in this proceeding. The Commission should limit the amount and usage of spectrum granted in this proceeding to only that which is necessary to provide a single channel of DTV service.

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<sup>5</sup> See, e.g., In the Matter of Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service, Fourth Further Notice of Proposed Rule Making and Third Notice of Inquiry, 10 FCC Rcd. 10540, 10541 ¶¶ 6, 7 (1995).

## **II. BROADCASTERS SHOULD BE REQUIRED TO RETURN THE PREVIOUSLY GRANTED ANALOG SPECTRUM ON A TIMELY BASIS**

Consistent with the articulated goal of preserving the public's resources, the Commission must recover the analog television spectrum from broadcasters once they have made the transition to digital. The Commission has consistently stated its intent to do so, however, no articulated plan has been proposed for such recovery. U S WEST would propose that the Commission allow broadcasters a set transition period, e.g., a maximum of 10 to 15 years, to make the transition to digital from the point new spectrum has been allocated. It is important that the Commission set the amount of time that a broadcaster has to make the transition so that consumers understand exactly how much time they have to make the necessary equipment changes or adjustments. It would also help consumers to make intelligent equipment purchase decisions during the transition period. By setting a specific time for transition, the Commission additionally creates some certainty with regards to the return of valuable public spectrum resources.

The Commission must also place limits on the uses of such spectrum during the transition period. During the transition period, broadcasters should not be allowed to use the spectrum to provide other services beyond the transmission of one channel of analog or digital television. Without such limitations, broadcasters might be inclined to accept the allocation of spectrum for other uses without intending to implement a transition to DTV. Such a result would frustrate the intent of the Commission, and, again, would negatively impact the competitive marketplace

for wireless services. Limits on the use of the allotted spectrum will serve to prevent such potential abuses.

III. THERE SHOULD BE NO ADDITIONAL MUST-CARRY OR OTHER OBLIGATIONS REQUIRED UPON CABLE OR OVS PROVIDERS

In its Comments, the NCTA opposed the efforts of broadcasters to expand cable must-carry obligations to include new digital services. U S WEST supports the NCTA's position on this issue. U S WEST would expand the NCTA's position to include OVS. Both OVS and cable systems should be free from any additional must-carry obligations as a result of broadcasters transition to digital television. As the NCTA argues, it would be inappropriate for the Commission to expand the current must-carry obligations imposed on cable and OVS providers. Additional must-carry requirements would take up significant system resources and further remove a cable or OVS operator's ability to choose the programming carrier on their systems. Such a result is not equitable, nor is it required by the current must-carry statute.

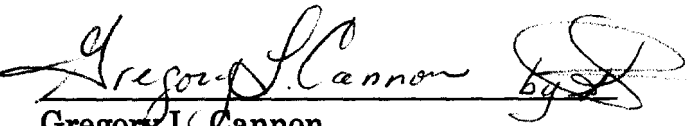
With the existing uncertainty which surrounds the continuing imposition of must-carry obligations on cable and OVS providers, the prudent course for the Commission would be to refrain from imposing additional obligations at this time. Even if must-carry survives, however, the Commission should not place additional burdens on the shoulders of cable and OVS operators when other multi-channel video programming providers have no similar obligations. To do so would further distort the video programming marketplace and reduce incentives to expand existing cable systems and/or build new open video systems.

#### IV. CONCLUSION

Based upon the foregoing, the Commission should place the appropriate limitations on the use of free public spectrum provided to broadcasters for DTV transmission, ensure prompt recovery of analog spectrum, and refrain from imposing additional burdens on cable and OVS providers. Such actions are consistent with the Commission's goal of providing broadcasters with a methodology for the transition to digital broadcasting and the development of open and competitive markets in the provision of other wireless services.

Respectfully submitted,

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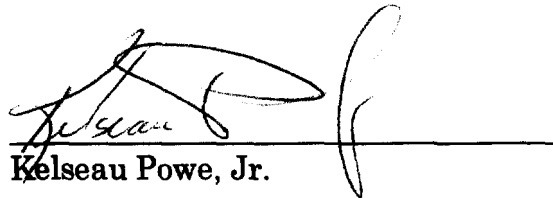
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January 24, 1997

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